## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

PATRICK BRADY, et al.

Civil Acton No. 02-2917 (JEI)

Plaintiffs,

v.

DECLARATION OF NICOLE M. ACCHIONE IN SUPPORT OF PLAINTIFFS' MOTION TO COMPEL

DISCOVERY

AIR LINE PILOTS ASSOCIATION.

Defendant.

I, Nicole M. Acchione, pursuant to R. 1:4-4, certify as follows:

- 1. I am associated with the law firm Trujillo Rodriguez & Richards, LLC, co-Class Counsel in this certified class action. I submit this Declaration in Support of Plaintiffs' Motion to Compel Discovery. I am fully familiar with the facts set forth herein.
- 2. Attached hereto as **Exhibit A** is a true and correct copy of the Plaintiffs' Fourth Request for Production of Documents on the Issue of Damages dated March 18, 2013.
- 3. Attached hereto as **Exhibit B** is a true and correct copy of the Plaintiffs' First Set of Damage Interrogatories dated March 18, 2013.
- 4. Attached hereto as **Exhibit C** is a true and correct copy of the Defendant's Responses and Objections to Plaintiffs' Fourth Request for Production of Documents on the Issue of Damage dated April 22, 2013.
- 5. Attached hereto as **Exhibit D** is a true and correct copy of Defendant's Responses and Objections to Plaintiffs' First Set of Damage Interrogatories dated April 22, 2013.
- 6. Attached hereto as **Exhibit E** is a true and correct copy of Defendant's May 29, 2013 letter to Judge Irenas in response to Plaintiffs' May 23, 2013 letter.

- 7. Attached hereto as **Exhibit F** is a true and correct copy of the Plaintiffs' First Set of document Requests on the Issue of Damages dated November 22, 2011.
- 8. Attached hereto as **Exhibit G** is a true and correct copy of *Addington vs. U.S.*Airline Pilots Association, Civil Action No. 08-1633 (D. Ariz. March 26, 2009).

I hereby certify that the following statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: (01413

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